



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

May 14, 2009

Ms. Jeryl Covington
City of Greensboro Environmental Services Department
P.O. Box 3136
Greensboro, NC 27402

Re: Approval of Corrective Action Plan (CAP)
White Street Landfill, Phase II, Guilford County, Permit #41-03

Dear Ms. Covington:

The Solid Waste Section has reviewed the *June 30, 2008 White Street Landfill Phase II Corrective Action Plan (CAP)* and the *April 2009 Revised White Street Landfill Phase II Corrective Action Plan (CAP)* submitted on behalf of the City of Greensboro by S&ME, Inc. Pursuant to 15A NCAC 13B .1636, the City of Greensboro selected Monitored Natural Attenuation (MNA), Phytoremediation, and maintaining a consistent contour within Phase II as the remedy to restore groundwater quality and effectively reduce the groundwater contamination at the facility. The Solid Waste Section approved the selected remedy for the White Street Landfill, Phase II on June 24, 2008.

The Corrective Action Plan (CAP) proposes implementation of the following activities:

- Monitored Natural Attenuation (MNA)
- Phytoremediation
- Maintaining a consistent contour within Phase II

A comprehensive MNA baseline will be established at the facility consisting of four consecutive quarterly sampling events. In addition, hybrid poplars and willows will be used in a phytoremediation system by enhancing the corrective action of the metal thallium and volatile organic compounds impacting groundwater downgradient from the facility. As a result, the Solid Waste Section hereby approves the Corrective Action Plan for immediate implementation. The implementation of the approved selected remedy shall now take place in accordance with 15A NCAC 13B .1637, .0547, and as outlined in the Corrective Action Plan. If the selected remedy proves to be ineffective, then the contingency plan located within the Corrective Action Plan shall be implemented. If you have any questions or concerns regarding this letter, please contact me at 919-508-8500. Thank you for your continued cooperation with this matter.

Sincerely,

Jaclynne Drummond
Hydrogeologist
Environmental Compliance
Solid Waste Section

cc: Connel Ware, S&ME, Inc.
Greg Thomasson, City of Greensboro
Mark Poindexter, Field Operations Supervisor
Jason Watkins, Central District Supervisor
Hugh Jernigan, Environmental Senior Specialist
Ming Tai Chao, Permitting Engineer
Ellen Lorscheider, Planning and Programs Manager
Solid Waste Section Central Files